

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 1038

**CERTIFICATION OF COUNSEL REGARDING ORDER (I) ESTABLISHING
CERTAIN BAR DATES FOR FILING PROOFS OF CLAIM AGAINST
THE DEBTORS, AND (II) GRANTING RELATED RELIEF,
INCLUDING NOTICE AND FILING PROCEDURES**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certifies as follows:

1. On the Petition Date, the Debtors filed the *Motion of Debtors for Entry of an Order (I) Establishing Certain Bar Dates for Filing Proofs of Claim Against the Debtors, and (II) Granting Related Relief, Including Notice and Filing Procedures* (the “**Motion**”)² (D.I. 1038).

A proposed form of order granting the Motion on an interim basis (the “**Proposed Order**”) was attached to the Motion.

2. Pursuant to the notice filed with the Motion, objections to the Motion were due on November 14, 2024. Prior to the objection deadline, the Debtors received informal

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

² Capitalized terms not defined herein have the meaning ascribed to them in the Motion.

comments to the form of Proposed Order from (a) various landlords represented by Ballard Spahr (the “**Landlords**”) and (b) ACE American Insurance Company, on its own behalf and on behalf of all of its U.S.-based affiliates and predecessors (the “**Chubb Companies**”).

3. The Debtors have revised the Proposed Order to resolve the informal comments. A copy of the revised Proposed Order is attached hereto as **Exhibit A**. Counsel to the Landlords and the Chubb Companies confirmed that they do not oppose entry of the revised Proposed Order.

4. A redline comparing the revised Proposed Order against the Proposed Order filed with the motion is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors respectfully request entry of the revised Proposed Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

[Signature page follows]

Dated: November 18, 2024
Wilmington, Delaware

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